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1                   Kissoon  
2 you were responsible for six different  
3 facilities?  
4       A. Yes.  
5       Q. What I am asking is, are there or  
6 have there been other facilities that you  
7 became responsible for besides those six; was  
8 there a time when you were no longer  
9 responsible for one of the six?  
10      A. It is not changing.  
11      Q. So today you are responsible for  
12 the same six facilities?  
13      A. Yes.  
14      Q. Has there ever been a time when  
15 you were responsible for some other facility  
16 besides the ones, the six that you have  
17 mentioned?  
18      A. No.  
19      Q. Since you began working for SP  
20 Payroll have you worked for any other  
21 companies as well?  
22      A. No.  
23      Q. In your job currently do you still  
24 spend half an hour to 45 minutes at each of  
25 these six facilities?

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1                   Kissoon  
2       A. Same.  
3       Q. Has that been the same for the  
4 whole time that you have worked for SP  
5 Payroll?  
6       A. Yes.  
7       Q. When you are not spending time at  
8 a garage or in transit what are your job  
9 activities, for example do you work in the  
10 office?  
11      A. No, I don't work in the office, I  
12 work in the garages and I have a private  
13 office on the side and I do inventory.  
14      Q. Where is that office located?  
15      A. It is -- all six garages have a  
16 section that you sit down and I go over the  
17 monthly list.  
18      Q. What type of lists are those?  
19      A. Monthly cards, parking.  
20      Q. It is a list of monthly parkers?  
21      A. Yes, I keep a past due list, make  
22 sure everything is okay.  
23      Q. What do you do to make sure that  
24 the workers are on time?  
25      A. I have them punch in, time card.

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1                   Kissoon  
2       Q. Has that been the same process  
3 since you started working for SP Payroll?  
4       A. Same process.  
5       Q. Is there a time clock at each  
6 garage that the men punch in and out?  
7       A. Yes.  
8       Q. What do you do to make sure that  
9 they are doing that?  
10      A. I have a view of it every day when  
11 I go there, I look at the time card.  
12      Q. You look at the time cards for the  
13 workers who are there when you are at the  
14 garage?  
15      A. Yes.  
16      Q. Where are the time cards kept in  
17 different garages?  
18      A. In different places.  
19      Q. Is there an office?  
20      A. Yes, it is in the office.  
21      Q. Each garage has an office?  
22      A. Each garage has an office.  
23      Q. Is that the same office where you  
24 go over the monthly lists?  
25      A. Yes.

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1                   Kissoon  
2       Q. What kind of work do you do in  
3 terms of scheduling, I think you mentioned  
4 scheduling is one of your responsibilities?  
5       A. Yes, from when I hire the guys, I  
6 put them on the schedule, what time to come to  
7 work.  
8       Q. Does each garage have a written  
9 schedule?  
10      A. Yes.  
11      Q. Are the facilities that you  
12 mentioned open 24 hours a day or something  
13 else?  
14      A. 24 hours a day.  
15      Q. Each of them is?  
16      A. Yes.  
17      Q. What type of shifts are there?  
18      A. Eight hour shifts and ten hour  
19 shifts.  
20      Q. Eight and ten?  
21      A. Yes.  
22      Q. Can you tell me which facilities  
23 have which type of shifts?  
24      A. Bienvenido has a 6 to 2. 2 to 10,  
25 10 to 6.

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1 Kissoon  
 2 Q. So that is three eight-hour  
 3 shifts?  
 4 A. Yes.  
 5 Q. How about castle?  
 6 A. Castle has 6 to 4, 4 to 12, and 12  
 7 to 10.  
 8 Q. So is there an overlap in the  
 9 shifts or -- so 6 a.m. to 4 p.m.?  
 10 A. Yes. 4 p.m. to midnight and  
 11 midnight to 10 a.m.  
 12 Q. So there is an overlap with the 6  
 13 a.m. and the midnight?  
 14 A. Yes.  
 15 Q. How about Sage?  
 16 A. Sage, same thing like Castle. 6  
 17 to 4, 4 to midnight, and midnight to 10.  
 18 Q. What about Ivy?  
 19 A. The same.  
 20 Q. And 145th Street?  
 21 A. Same.  
 22 Q. 155th?  
 23 A. The same.  
 24 Q. So Bienvenido is the only one that  
 25 is different?

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1 Kissoon  
 2 another worker from a garage to a different  
 3 garage for an adjustment like you mentioned,  
 4 did the person punch in and out at the place  
 5 that they were sent to?  
 6 A. No.  
 7 Q. What are your responsibilities in  
 8 terms of picking up reports; I think that is  
 9 one of the things that you mentioned, so tell  
 10 me what that involves?  
 11 A. Picking up the reports, like the  
 12 shift reports in the day. The day report.  
 13 Q. What information is in the shift  
 14 reports?  
 15 A. The total tickets in the day and  
 16 the cash and the checks.  
 17 Q. You pick up checks and cash also?  
 18 A. Yes.  
 19 Q. You bring them back to --  
 20 A. To the office, 1832 Second Avenue.  
 21 Q. Has that process changed since you  
 22 started working at SP Payroll?  
 23 A. No.  
 24 Q. Always been the same?  
 25 A. Always been the same.

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1 Kissoon  
 2 A. Yes. It is a one -- 6 to 2, 2 to  
 3 10 and 10 to 6.  
 4 Q. The schedules that you are  
 5 describing are the current schedules?  
 6 A. Yes.  
 7 Q. Have the schedules changed since  
 8 you started working for SP Payroll?  
 9 A. No, it has not changed.  
 10 Q. Always been the same since you  
 11 started?  
 12 A. Maybe adjustment a little bit.  
 13 Q. Can you tell me more specifically  
 14 how it changed?  
 15 A. It changed like if the garage is  
 16 busy, I need an extra man, I would take a man  
 17 from one garage and put him in the next  
 18 garage.  
 19 Q. How would you find out if you  
 20 needed to do that, with a garage needed extra  
 21 help?  
 22 A. If I am at the location at the  
 23 morning and I see by the tickets, they have a  
 24 special event in the neighborhood.  
 25 Q. Okay. When you sent one or

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1 Kissoon  
 2 Q. While you have worked for SP  
 3 Payroll has anyone else been involved in  
 4 hiring and firing employees?  
 5 A. Can you repeat the question.  
 6 Q. Since you started working for SP  
 7 Payroll are there other supervisors for that  
 8 company besides yourself?  
 9 A. Yes, David Saperstein.  
 10 Q. How about supervisors with the  
 11 same type of responsibilities that you have,  
 12 people going to the garages and so forth?  
 13 A. We had assistants.  
 14 Q. You had an assistant?  
 15 A. Yes.  
 16 Q. When was that?  
 17 A. About two years ago.  
 18 Q. What was his name?  
 19 A. Pablo Oleas.  
 20 Q. Pablo was your assistant for a  
 21 period of time?  
 22 A. Yes.  
 23 Q. What kind of work did he do?  
 24 A. Typically the same thing that I  
 25 do.

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Kissoon

1 Q. Do you know when Pablo stopped  
2 working for SP Payroll?

3 A. He didn't stop, he is still there.

4 Q. Still there?

5 A. Still working.

6 Q. Is Pablo the only supervisor --  
7 sorry, assistant that you had since you  
8 started working for SP Payroll?

9 A. The same.

10 Q. Has there been any other  
11 supervisors besides yourself?

12 A. No.

13 Q. Do you know if there is a written  
14 description for the job that you have?

15 A. Can you explain that?

16 Q. Is there a document, something in  
17 writing that describes what your  
18 responsibilities are supposed to be?

19 A. Yes.

20 Q. When did you first see that?

21 A. I can't remember, but it is a long  
22 time.

23 Q. Do you have access to a copy of  
24 that today, now?

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Kissoon

1 A. Yes.

2 Q. Where is it kept?

3 A. It is kept in the office.

4 Q. At 1832?

5 A. 1832.

6 Q. The time cards that you mentioned,  
7 are they always kept at the garages, are they  
8 ever brought to the office for example?

9 A. No, they are kept at the garages.

10 Q. Are there any reports that you  
11 prepare -- let me back up a minute.

12 Who perhaps the reports that you  
13 told me about a few minutes ago that list the  
14 cash and checks and so forth?

15 A. Who kept it?

16 Q. Who prepared those reports?

17 A. I prepare it.

18 Q. Do you do that at each garage?

19 A. No, I go to the 1832 Second  
20 Avenue.

21 Q. How do you do that?

22 A. I randomly -- I do it by garages.

23 On a chart I write it down, the total payments  
24 come in and I give it to Sam.

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Kissoon

1 Q. Are there papers that you have to  
2 take with you from the garage in order to do  
3 that in the office?

4 A. No.

5 Q. How do you know what to write  
6 down?

7 A. How do I know what to write down.

8 Q. Yes. How do you know what the  
9 amount is that you need to write?

10 A. Because it is on the report, on a  
11 print out from the computer.

12 Q. Does that print out get created in  
13 the garage?

14 A. Yes.

15 Q. Who does that?

16 A. The man on duty. The manager.

17 Q. Besides that report that you  
18 create in the office with the receipts, are  
19 there other types of reports that you prepare?

20 A. No.

21 Q. When you started -- well, let me  
22 back up a minute. Do you know if the garages  
23 that you have mentioned are licensed by New  
24 York City?

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Kissoon

1 A. Yes.

2 Q. How do you know that?

3 A. We have the license posted up in  
4 the garages, each garage.

5 Q. Are there any records that would  
6 show how many cars are in the garage at any  
7 particular time?

8 A. Yes.

9 Q. How would I find that out or how  
10 would you find that out?

11 A. We have a monthly list that show  
12 each cars in the garages.

13 Q. Would that show me how many cars  
14 are in the garage let's say at 2 p.m. on a  
15 particular day?

16 A. Yes.

17 Q. How does that list get created?

18 A. By the man on the shift.

19 Q. What is that list called, does  
20 that have a name?

21 A. It is a monthly inventory list.

22 Q. It goes by day or time?

23 A. By day.

24 Q. Not by time of day?

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Kissoon

A. The day and time.

Q. Where are those lists kept?

A. In the garage.

Q. Do you know what the manager does in order to create that list, do you know how he does that?

A. Yes, he walks around the garage, it is not only the manager, the other workers do it.

Q. Is there a list for each day or shift or something else?

A. It is a list.

Q. It goes by day?

A. By day.

Q. Do you have any responsibilities in regards to paying the workers?

A. No.

Q. No?

A. Excuse me.

Q. Are you involved in paying the workers their pay, are you involved in that?

A. Yes, I handle the checks.

Q. And is that on a weekly basis?

A. Weekly.

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Q. Is that on a set day of the week that you do that for each garage, does it vary, something else?

A. It could be like on a Wednesday or Thursday.

Q. Where do you get the checks from?

A. From David.

Q. When you get the checks are they in envelopes?

A. Yes.

Q. Is there cash in the envelopes also?

MS. MEYERS: Objection. When?

Q. I am talking now, currently, today?

A. Some of them.

Q. Which ones have cash in them?

A. Some of the employees have cash inside.

Q. Who decides whether there is going to be cash for one employee or another?

A. David.

Q. Are you involved in that process at all?

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Kissoon

A. No.

Q. When you started working for SP Payroll were you involved in giving the workers their paychecks?

A. Repeat that again.

Q. Yes. When you started working for SP Payroll was it part of your job to give the workers their paychecks?

A. It was not part of my job. It was given to me to give out to the employees.

Q. That was something that you did as part of your work?

A. Yes.

Q. At that time were any of the workers also given cash along with their paychecks; I am talking about when you started?

A. I can't remember.

Q. Was David there when you started, did he also work for SP Payroll?

A. Yes.

Q. When you started working for SP Payroll did you have any discussion with David about whether any workers were supposed to be

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getting cash?

A. No.

Q. Did you ever discuss that with Sam Podolak?

A. No.

Q. Do you remember -- let me make sure I understand.

As of today some workers get cash along with their paychecks; is that right, that is the system now, do I understand that correctly, tell me if I am wrong; do you understand my question?

A. No, I don't understand.

Q. Currently the system is that some workers get cash along with their paychecks; is that correct?

A. Yes.

Q. Again correct me if I am wrong, you don't remember if any workers were getting cash when you started working at SP Payroll?

A. I do remember that they took cash.

Q. Some employees got cash when I started?

A. Most all of them.

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